

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DIEGO AGUILAR, KENDALL
CARNAHAN and MICHAEL OKAFOR on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

BATON CORPORATION LTD, d/b/a
PUMP.FUN, ALON COHEN, DYLAN
KERLER, and NOAH BERNHARD HUGO
TWEEDALE, SOLANA LABS INC.,
SOLANA FOUNDATION, JITO LABS
INC., JITO FOUNDATION, ANATOLY
YAKOVENKO, RAJ GOKAL, DAN
ALBERT, AUSTIN FEDERA, LILY LIU,
LUCAS BRUDER, and BRIAN SMITH,

Defendants.

Case No.: 1:25-cv-00880-CM-BCM

Hon. Colleen McMahon

**[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION FOR ALTERNATIVE
SERVICE AND AN EXTENSION OF TIME TO SERVE CERTAIN DEFENDANTS**

Upon consideration of: (i) Plaintiffs' Motion for Alternative Service and an Extension of Time to Serve Defendants Anatoly Yakovenko, Raj Gokal, Lily Liu, Brian Smith, Lucas Bruder, and Jito Labs Foundation (collectively, the "Defendants") (the "Motion"); (ii) the Memorandum of Law in support thereof; (iii) the Declaration of Max L. Burwick and exhibits thereto; (iv) all other pleadings and arguments submitted to this Court, and for good cause shown, **IT IS HEREBY ORDERED THAT:**

1. Plaintiffs' Motion for Alternative Service and an Extension of Time to Serve Certain Defendants is **GRANTED**;

2. Plaintiffs shall effect service on Defendants in the manner authorized below within twenty (20) days of entry of this Order.

3. Counsel for Plaintiffs is authorized to serve the Defendants with copies of the Amended Complaint (ECF No. 34), the Summons issued to Defendants, and this Order (collectively the “Service Documents”) by:

- Defendant Anatoly Yakovenko:
 - By email to the address aeyakovenko@gmail.com.
 - By Federal Express to 840 Lake St, APT 1, San Francisco, CA 94118.
- Defendant Raj Gokal:
 - By email to the address rajivgokal@gmail.com.
 - By Federal Express to 1040 Blue Indigo Dr, Roswell, GA 30076.
 - By Federal Express to 2 Hoffman Ave, San Francisco, CA 94114.
- Defendant Lily Liu:
 - By email to the address lilyyliu@gmail.com.
 - By Federal Express to 210 Crocker Ave, Piedmont, CA 94610.
- Defendant Brian Smith:
 - By email to the address brian@jito.network.
 - By Direct Message to Defendant’s [X.com](https://x.com/brian_smith_0) account https://x.com/brian_smith_0 with a hyperlink to the service documents.
- Defendant Lucas Bruder:
 - By email to the addresses lbruder827@gmail.com and lbruder@me.com.
 - By Direct Message to Defendant’s [X.com](https://x.com/buffalu) account <https://x.com/buffalu> with a hyperlink to the service documents.

- By Federal Express to 405 Cedar Oak Drive, Austin, Texas 78746.
- Defendant Jito Foundation:
 - By email to the address legal@jito.network.
 - By email to Defendant Jito Foundation's managing agent, Brian Smith, at the email address brian@jito.network.
 - By Direct Message to Defendant Jito Foundation's managing agent, Brian Smith's [X.com](#) account https://x.com/brian_smith_0 with a hyperlink to the service documents.
 - By Direct Message to Defendant Jito Foundation's managing agent, Nick Almond's [X.com](#) account <https://x.com/DrNickA> with a hyperlink to the service documents.
- 4. The Email will contain a prominently-displayed message that reads:

[Defendants name] has been named as a Defendant in a civil lawsuit in the federal District Court for the Southern District of New York, *Aguilar v. Baton Corporation Ltd. d/b/a Pump.Fun*, No. 1:25-cv-00880-CM-BCM (S.D.N.Y 2025). This post constitutes court-approved alternative service of the Summons issued to [defendants name] the Amended Complaint and an Order authorizing Alternative Service in that action.

5. Service on the Defendants shall be effective and complete as of the date on which counsel for Plaintiffs have completed the steps set forth in Paragraphs 2 through 4 of this Order and has filed an affidavit or certificate of service to that effect.

IT IS SO ORDERED

DATED: _____, 2025

UNITED STATES DISTRICT JUDGE
HON. COLLEEN McMAHON